

ACE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

FEB - 8 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

RAYMON PARKER #20170606-

107

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

1:19-cv-00820

Judge Jorge L. Alonso

Magistrate Judge Jeffrey T. Gilbert)
PC5

CITY OF CHICAGO, DET. MCDEMOTT #

20364, DET. LARMON #20734, P. O. MILES

#7937, P. O. FARIAS #9942, P. O.

CUEVAS #16651, SGT. CORTESI #1146,

P. O. JAGIELSKI #17649, P. O. MENAGH #3925,

ASA PAVLINSKI, DANIEL SHINE #1493

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐ OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: RAYMON PARKER
- B. List all aliases: N/A
- C. Prisoner identification number: 20170606107
- D. Place of present confinement: COOK COUNTY JAIL
- E. Address: 2600 S. CALIFORNIA AVE

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: CITY OF CHICAGO
Title: CITY OF CHICAGO
Place of Employment: CITY OF CHICAGO
- B. Defendant: DETECTIVE MCDEMOTT #20864 AND #20800
Title: DETECTIVE
Place of Employment: CHICAGO POLICE DEPARTMENT
- C. Defendant: DETECTIVE TIMOTHY LARMON #20734
Title: DETECTIVE
Place of Employment: CHICAGO POLICE DEPARTMENT

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

II. DEFENDANT(S):

- D. DEFENDANT: P.O. MYLES #7937
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- E. DEFENDANT: P.O. FARIAS #9942
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- F. DEFENDANT: P.O. CUEVAS #16651
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- G. DEFENDANT: SGT. CORTESI #1146
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- H. DEFENDANT: P.O. JAGIELSKI #17649
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- I. DEFENDANT: P.O. MENAGH #3925
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- J. DEFENDANT: P.O. MILLER #13369
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- K. DEFENDANT: DANTEL SHINE #1443
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT
- L. DEFENDANT: ASSIST STATES ATTORNEY PAULINSKI
TITLE: ASSISTANT STATES ATTORNEY
PLACE OF EMPLOYMENT: CITY OF CHICAGO STATES ATTORNEY OFFICE
- M. DEFENDANT: JOHN DOE
TITLE: POLICE OFFICER
PLACE OF EMPLOYMENT: CHICAGO POLICE DEPARTMENT.
- N. DEFENDANT: JANE DOE
TITLE: ASSISTANT STATES ATTORNEY
PLACE OF EMPLOYMENT: CITY OF CHICAGO STATES ATTORNEY OFFICE

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: PARKER V. CASTILLO, NO. 13 C 6003
- B. Approximate date of filing lawsuit: AUGUST 2013
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: JULIO CASTILLO, C/O COUCH
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: EXCESSIVE FORCE
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): SETTLED
- I. Approximate date of disposition: SEPTEMBER 2017

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

- PAGE 3 CONTINUED -

III.

- A. PARKER V. BURG, NO. 17 C 5177
- B. JULY 2017
- C. N/A
- D. BRIAN BURG AND BRYAN ZYDER
- E. NORTHERN DISTRICT OF ILLINOIS
- F. ROBERT M. DOWD JR.
- G. WRONGFUL ARREST, FALSE IMPRISONMENT
- H. PENDING
- I. PENDING

- A. PARKER V. OWNER-CHARLIE, NO. 17 C 5767
- B. JULY 2017
- C. N/A
- D. STORE OWNER CHARLIE
- E. NORTHERN DISTRICT OF ILLINOIS
- F. N/A
- G. DEFAMATION
- H. DISMISSED
- I. ~~RECEIVED~~ 2017 AUGUST

- A. PARKER V. DIVINE, NO. 17 C 7410
- B. AUGUST 2017
- C. N/A
- D. C/O GALUEL, C/O DIVINE
- E. NORTHERN DISTRICT OF ILLINOIS
- F. N/A
- G. EXCESSIVE FORCE
- H. DISMISSED
- I. DECEMBER 2017

- A. PARKER V. DART, NO. 18 C 4274
- B. JUNE 2018
- C. N/A
- D. THOMAS V. DART, DEPUTY VASQUEZ, JOAN DOE SHERIFFS DEPUTY
- E. NORTHERN DISTRICT OF ILLINOIS
- F. CHARLES R. NORGULE
- G. FALSE ARREST, FALSE IMPRISONMENT
- H. DISMISSED
- I. 1-15-19

- A. PARKER V. STATES ATTORNEY OFFICE, NO 18 C 4860
- B. JUNE 2018?
- C. N/A
- D. KIMBERLY M. FOXK, STATES ATTORNEY OFFICE
- E. NORTHERN DISTRICT OF ILLINOIS
- F. ELAINE E. BUCKLO
- G. MALICIOUS PROSECUTION
- H. DISMISSED
- I. 2018?

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

JUNE 4TH 2017 I WAS FALSELY ARRESTED AND MALICIOUSLY PROSECUTED FOR ARMED ROBBERY AND ARMED HABITUAL CRIMINAL UNLAW CHARGES WHEN CHICAGO POLICE DEPARTMENT OFFICERS MYLES #7937, FARIAS #9942, CUEVAS #16651, SGT. CORTES #1146, JAGIELSKI #17649, MENAGH #3925, MILLER #13369, AMONST UNKNOWN OFFICERS MADE AN WARRANTLESS ENTRY INTO THE MOTHER OF MY CHILDRENS APARTMENT MOTIVATED BY LUDICROUS FALSE STATEMENTS THAT I ALLEGEDLY BOBBED A CONVENIENCE STORE ARMED WITH A FIREARM FOR A \$50 SNACK ITEM. DETECTIVE MCDEMOTT USING KNOWN FALSE TESTIMONY WITH DISREGARD FOR THE TRUTH ILLUSTRATED FALSE REPORTS WITH DETECTIVE TIMOTHY LARMON #20734 AND ASSISTANT STATES ATTORNEY PAULINSKI. UNKNOWN ASA (POSSIBLY PAULINSKI) TOGETHER WITH DETECTIVE TIMOTHY LARMON #20734 WILLFULLY, KNOWING, AND INTENTIONALLY PRESENTED FALSE, MISLEADING TESTIMONY TO A GRAND JURY WHOM INDICTED ME ALLEGING I BOBBED A CONVENIENCE STORE AT GROUNDPOINT FOR A \$50 SNACK ITEM. DANIEL SHINE #1443 OF THE CPD APPROVED THESE OUTRAGEOUS FALSE CHARGES. ALL ABOVE NAMED CPD OFFICERS AND ASA PAULINSKI WERE IN POSSESSION EXCURATORY SURVEILLANCE VIDEO OF ME PAYING FOR MY ITEMS, YET ALL PUBLIC OFFICIALS INVOLVED MALICIOUSLY AND INTENTIONALLY INFLECTED EMOTIONAL DISTRESS ON ME AND MY FAMILY FOR 18 MONTHS

WITH THEIR DELIBERATE INDIFFERENCE FOR MY INNOCENCE. 9-5-18 I HEARD
A MOTION TO SUPPRESS EVIDENCE ON GROUNDS OF 4TH AMENDMENT VIOLATION. 9-7-18
WHILE GIVING HER HONORS RULING, JUDGE ERICA L. REDDICK OF THE COOK
COUNTY CRIMINAL CIRCUIT STATED "THERE WAS NO PROBABLE CAUSE TO ARREST,
EXIGENT CIRCUMSTANCES WAS NOT ESTABLISHED. HOT PURSUIT WAS NOT ESTABLISHED,
"THERE WAS NO PROBABLE CAUSE." 12-21-18, JUDGE REDDICK GRANTED MY
MOTION TO SUPPRESS EVIDENCE ON GROUNDS OF ILLEGAL SEARCH AND SEIZURE.
1-4-19, THE STATES ATTORNEY OFFICE DISMISSED ARMED ROBBERY CHARGES
AGAINST ME STATING THAT THEY COULD NOT MEET THEIR BURDEN OF PROOF.
THE PAIN AND SUFFERING WITH MENTAL ANGUISH ME AND MY FAMILY HAVE
ENDURED THESE PAST 18 MONTHS I SAT UNLAWFULLY DETAINED ALONGSIDE
OUR FINANCIAL LOSS IS EMOTIONALLY AND MENTALLY OPPRESSIVE. THE
JOB OF THE PUBLIC PROSECUTOR IS NOT MERELY TO CONVICT AS IT IS
TO SEE JUSTICE DONE, ESPECIALLY HAVING THE DISCRETION TO DISMISS
UNJUST CHARGES. MY 4TH AND 14TH AMENDMENTS HAVE BEEN SUBSTANTIATELY
DISREGARDED AND VIOLATED BY ABOVE NAMED PUBLIC OFFICIALS MISCONDUCT
AND ABUSE OF AUTHORITY WHILE EMPLOYED BY THE CITY OF CHICAGO.
I AM SUING P.O. MYLES #7937, P.O. FARIAS #9942, ^{P.O.} CUEVAS #16651, ^{P.O.} SGT.
CORTESI #1146, ^{P.O.} JAGIELSKI #17649, ^{P.O.} MENAGH #3925, P.O. MILLER #13369, JOHN DOE
OFFICERS, DETECTIVE MCDEMOTT #20364, DETECTIVE TIMOTHY LARSON #20734, ASA
PAULINSKI IN THEIR INDIVIDUAL AND PROFESSIONAL CAPACITY FOR FALSE
ARREST, FALSE IMPRISONMENT, MALICIOUS PROSECUTION, DELIBERATE INDIFFERENCE,
INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, PAIN AND SUFFERING WITH MENTAL
ANGUISH FOR COMPENSATORY AND PUNITIVE DAMAGES. I AM ALSO SUING THE
CITY OF CHICAGO.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I WANT TO BE COMPENSATED FOR PUNITIVE AND COMPEN-
SATORY DAMAGES AND PAIN AND SUFFERING IN EXCESS OF
\$5 MILLION DOLLARS

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 23 day of JANUARY, 20 19

Raymond Parker
(Signature of plaintiff or plaintiffs)

RAYMON PARKER
(Print name)

20170606107
(I.D. Number)

2600 S CALIFORNIA AVE, CHICAGO, ILLINOIS
60608
(Address)